

Kelly T. Smith 196821
THE SMITH FIRM
1541 Corporate Way, Suite 100
Sacramento, CA 95831
Telephone: (916) 442-2019
Facsimile: (916) 442-0220

Attorney for Creditor
MOE MOHANNA

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA**

In re

BANKRUPTCY OF ROBERT A. COOK,

Debtor.

Case No. 11-39335-C-11

REQUEST FOR SPECIAL NOTICE

[FRBP Rule 2002]

NOTICE

To the United State Bankruptcy Judge, the Debtor, the Trustee and all interested parties, PLEASE TAKE NOTICE that The Smith Firm, attorneys for creditor MOE MOHANNA hereby requests special notice of all events relevant to the above captions bankruptcy proceedings and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors' committees and parties-in-interest and other notices as required by the United State Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

The Smith Firm requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:


Kelly T. Smith
The Smith Firm
1541 Corporate Way, Suite 100
Sacramento, CA 95831

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- 1) Right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United State District Court Judge;
- 2) Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 USC §157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United State Constitution;
- 3) Right to have the reference of this matter withdrawn by the United State District
- 4) Right to have the reference of this matter withdrawn by the United State District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- 5) Other rights, claims, actions, defenses, setoffs, recoupments or other matter to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All the above rights are expressly reserved and preserved by this party without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

DATE: 10/11/11



KELLY T. SMITH
Attorney for Creditor
MOE MOHANNA